

COLUMBUS

NEW YORK

September 21, 2016

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D,.C. 20554

Re:

1 800 Collect, Inc.

WC Docket No. 16-xx and File No. ITC-ASG-20160901-00256

Dear Ms. Dortch:

1 800 Collect, Inc., the Assignor in the above-referenced Joint Application for Consent to Assignment of Section 214 Authority, from 1 800 Collect, Inc. to 18 C, LLC, hereby submits a Statement to be treated as an amendment to this Joint Application.

The Statement provides additional information concerning the Assignor and is in response to a request from the staff of the Commission's Wireline Competition Bureau.

Should there be any questions in regard hereto, please communicate with the undersigned.

Respectfully submitted,

Barry A. Friedman

cc:

Mr. Gregory Kwan, FCC Wireline Competition Bureau

Ms. Sumita Mukhoty, FCC International Bureau

Enclosure

STATEMENT

1 800 Collect, Inc. ("18C") wishes to supplement its application for assignment of its FCC Section 214 authority by submission of the following information.

18C is presently owned by two irrevocable trusts. These two irrevocable trusts are:

CMG 2011 Irrevocable Trust, established under the Declaration of Trust dated March 28, 2011, David Abeles, Trustee
Suite 300
12526 High Bluff Drive
San Diego, California 92130
(619) 661-6661
Ownership Interest 50.00%

RKG 2011 Irrevocable Trust, established under the Declaration of Trust, dated March 28, 2011, David Abeles, Trustee Suite 300 12526 High Bluff Drive San Diego, California 92130 (619) 661-6661 Ownership: 50.00%

As indicated, the two irrevocable trusts share a common Trustee.

The beneficiaries of the irrevocable trusts are Messrs. Rafael Galicot and Gregorio Galicot. Messrs. Rafael and Gregorio Galicot, who are both United States citizens, are also trustees of trusts that constitute all of the equity owners of BBG Communications, Inc.

BBG Communications, Inc. has two lines of business in the domestic telecommunications industry: AOS services and wholesale services for third parties.

The trusts are engaged in a plan to divest themselves of operational interests in domestic telecommunications services. As an element thereof, they propose to engage in an assignment of 1 800 Collect, Inc., with the current shareholders of 18C remaining solely as equity owners of the proposed Assignee, 18C, LLC. Consistent therewith, the Assignor and Assignee have agreed, in their contractual arrangement, that the Assignor will only have an ownership interest and not a control interest in 18C, LLC following consummation of the transaction. The contractual arrangement provides that the elements of control will be vested in WiMacTel, Inc., the controlling entity, and the trusts, as members of 18C, LLC, will not have any elements of control.

Owing to the design of this transaction, in which ownership is not changing but control is changing, the Assignor and Assignee agreed that the consent of the FCC is required and, as a result, the instant application for consent to the assignment of Section 2`14 authority has been submitted and such consent, prior to consummation, is being requested.